

JS 44 (Rev. 12/07, NJ 5/08)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS CRYSTAL DUNSTON		DEFENDANTS NCO FINANCIAL SYSTEMS, INC.	
(b) County of Residence of First Listed Plaintiff _____		County of Residence of First Listed Defendant _____	
(c) Attorney's (Firm Name, Address, Telephone Number and Email Address) Craig Thor Kimmel, Esquire Kimmel & Silverman, P.C. 30 E. Butler Pike Ambler, PA 19002 (215) 540-8888		NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED. Attorneys (If Known)	
II. BASIS OF JURISDICTION (Place an "X" in One Box Only)		III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)	
<input type="checkbox"/> 1 U.S. Government Plaintiff	<input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)	Citizen of This State <input type="checkbox"/> 1 <input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State <input type="checkbox"/> 4 <input type="checkbox"/> 4
<input type="checkbox"/> 2 U.S. Government Defendant	<input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	Citizen of Another State <input type="checkbox"/> 2 <input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State <input type="checkbox"/> 5 <input type="checkbox"/> 5
		Citizen or Subject of a Foreign Country <input type="checkbox"/> 3 <input type="checkbox"/> 3	Foreign Nation <input type="checkbox"/> 6 <input type="checkbox"/> 6
IV. NATURE OF SUIT (Place an "X" in One Box Only)			
CONTRACT		TORTS	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise		PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 340 Marine <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 385 Property Damage Product Liability <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	
		FORFEITURE/PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airlinc Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	
		BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157	
		OTHER STATUTES PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	
		SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395F) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWV (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	
		FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	
REAL PROPERTY		CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/ Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	
		PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 520 Habeas Corpus: General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	
		IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	
V. ORIGIN (Place an "X" in One Box Only)		Appeal to District Judge from Magistrate Judgment	
<input checked="" type="checkbox"/> 1 Original Proceeding <input type="checkbox"/> 2 Removed from State Court <input type="checkbox"/> 3 Remanded from Appellate Court		<input type="checkbox"/> 4 Reinstated or Reopened <input type="checkbox"/> 5 Transferred from another district (specify) _____ <input type="checkbox"/> 6 Multidistrict Litigation <input type="checkbox"/> 7	
Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 15 U.S.C SECTION 1692			
VI. CAUSE OF ACTION		Brief description of cause: Fair Debt Collection Practices Act	
VII. REQUESTED IN COMPLAINT:		<input type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMANDS <input type="checkbox"/> CHECK YES only if demanded in complaint: JURY DEMAND: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
VIII. RELATED CASE(S)		(See instructions): JUDGE  DOCKET NUMBER _____	
Explanation: 4/15/11		SIGNATURE OF ATTORNEY OF RECORD	

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 2075 B. Mather Way, Elkins Park, PA 19027

Address of Defendant: 501 Prudential Road, Horsham, PA 19044

Place of Accident, Incident or Transaction:

(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes No

Does this case involve multidistrict litigation possibilities?

Yes No

RELATED CASE, IF ANY:

Case Number: _____ Judge _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?

Yes No

2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?

Yes No

3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?

Yes No

4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?

Yes No

CIVIL: (Place in ONE CATEGORY ONLY)

A. *Federal Question Cases:*

1. Indemnity Contract, Marine Contract, and All Other Contracts
2. FELA
3. Jones Act-Personal Injury
4. Antitrust
5. Patent
6. Labor-Management Relations

B. *Diversity Jurisdiction Cases:*

1. Insurance Contract and Other Contracts
2. Airplane Personal Injury
3. Assault, Defamation
4. Marine Personal Injury
5. Motor Vehicle Personal Injury
6. Other Personal Injury (Please specify)

7. Civil Rights
8. Habeas Corpus
9. Securities Act(s) Cases
10. Social Security Review Cases

7. Products Liability
8. Products Liability — Asbestos
9. All other Diversity Cases

(Please specify)

11. All other Federal Question Cases 15 U.S.C. 1629
(Please specify)

ARBITRATION CERTIFICATION

(Check Appropriate Category)

Craig Thor Kimmel, counsel of record do hereby certify:

- Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
- Relief other than monetary damages is sought.

DATE: 4/15/11

Attorney-at-Law

57100

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 4/15/11

Attorney-at-Law

57100

Attorney I.D.#

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CASE MANAGEMENT TRACK DESIGNATION FORM

Crystal Dunston

CIVIL ACTION

v.

NCG Financial Systems, Inc.

NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

4/15/11

Date

Craig Thur Kimmel

Attorney-at-Law

Crystal Dunston

Attorney for

215-540-8888

877-788-2864

Kimmel@creditlaw.com

Telephone

FAX Number

E-Mail Address

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

COMPLAINT

CRYSTAL DUNSTON ("Plaintiff"), by and through her attorneys, KIMMEL & SILVERMAN, P.C., alleges the following against NCO FINANCIAL SYSTEMS, INC., ("Defendant"):

INTRODUCTION

1. Count I of Plaintiff's Complaint is based on the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* (FDCPA).

JURISDICTION AND VENUE

2. Jurisdiction of this court arises pursuant to 15 U.S.C. § 1692k(d), which states that such actions may be brought and heard before "any appropriate United States district court without regard to the amount in controversy," and 28 U.S.C. § 1331 grants this court original jurisdiction of all civil actions arising under the laws of the United States.

1 3. Defendant conducts business and has an office in the Commonwealth
2 of Pennsylvania, and therefore, personal jurisdiction is established.
3

4 4. Venue is proper pursuant to 28 U.S.C. § 1331(b)(1).
5

5 5. Declaratory relief is available pursuant to 28 U.S.C. §§ 2201 and
6 2202.
7

PARTIES

9 6. Plaintiff is a natural person residing in Elkins Park, Pennsylvania,
10 19027.

11 7. Plaintiff is a "consumer" as that term is defined by 15 U.S.C. §
12 1692a(3).
13

14 8. Defendant is a national debt collection company with its corporate
15 headquarters located at 507 Prudential Road, Horsham, Pennsylvania, 19044-
16 2308.
17

18 9. Defendant is a debt collector as that term is defined by 15 U.S.C. §
19 1692a(6), and sought to collect a consumer debt from Plaintiff.
20

21 10. Defendant acted through its agents, employees, officers, members,
22 directors, heirs, successors, assigns, principals, trustees, sureties, subrogees,
23 representatives, and insurers.
24

PRELIMINARY STATEMENT

11. The Fair Debt Collection Practices Act (“FDCPA”) is a
comprehensive statute, which prohibits a catalog of activities in connection with
the collection of debts by third parties. See 15 U.S.C. § 1692 *et seq.* The FDCPA
imposes civil liability on any person or entity that violates its provisions, and
establishes general standards of debt collector conduct, defines abuse, and provides
for specific consumer rights. 15 U.S.C. § 1692k. The operative provisions of the
FDCPA declare certain rights to be provided to or claimed by debtors, forbid
deceitful and misleading practices, prohibit harassing and abusive tactics, and
proscribe unfair or unconscionable conduct, both generally and in a specific list of
disapproved practices.

15. In particular, the FDCPA broadly enumerates several practices
16. considered contrary to its stated purpose, and forbids debt collectors from taking
17. such action. The substantive heart of the FDCPA lies in three broad prohibitions.
18. First, a “debt collector may not engage in any conduct the natural consequence of
19. which is to harass, oppress, or abuse any person in connection with the collection
20. of a debt.” 15 U.S.C. § 1692d. Second, a “debt collector may not use any false,
21. deceptive, or misleading representation or means in connection with the collection
22. of any debt.” 15 U.S.C. § 1692e. And third, a “debt collector may not use unfair
23. or unconscionable means to collect or attempt to collect any debt.” 15 U.S.C. §

1 1692f. The FDCPA is designed to protect consumers from unscrupulous
2 collectors, whether or not there exists a valid debt, broadly prohibits unfair or
3 unconscionable collection methods, conduct which harasses, oppresses or abuses
4 any debtor, and any false, deceptive or misleading statements in connection with
5 the collection of a debt.

7 13. In enacting the FDCPA, the United States Congress found that “[t]here
8 is abundant evidence of the use of abusive, deceptive, and unfair debt collection
9 practices by many debt collectors,” which “contribute to the number of personal
10 bankruptcies, to marital instability, to the loss of jobs, and to invasions of
11 individual privacy.” 15 U.S.C. § 1692a. Congress additionally found existing
12 laws and procedures for redressing debt collection injuries to be inadequate to
13 protect consumers. 15 U.S.C. § 1692b.

16 14. Congress enacted the FDCPA to regulate the collection of consumer
17 debts by debt collectors. The express purposes of the FDCPA are to “eliminate
18 abusive debt collection practices by debt collectors, to insure that debt collectors
19 who refrain from using abusive debt collection practices are not competitively
20 disadvantaged, and to promote consistent State action to protect consumers against
21 debt collection abuses.” 15 U.S.C. § 1692e.

24 **FACTUAL ALLEGATIONS**

25 15. At all pertinent times hereto, Defendant was hired to collect two

1 separate consumer debts allegedly owed by Plaintiff and attempted to collect those
2 debts from Plaintiff.
3

4 16. The alleged debts at issue arose out of transactions, which were
5 primarily for personal, family, or household purposes.
6

7 17. Specifically, Defendant was attempting to collect a debt in the amount
8 of \$406.00 from Plaintiff on behalf of TD Bank.
9

10 18. Plaintiff disputed owing any debt to TD Bank, having signed an
11 affidavit for TD Bank explaining that she had a zero balance and any subsequent
12 charges on the account were made by another individual without her authorization.
13

14 19. Also, Defendant was attempting to collect a debt in the amount of
15 \$336.00 from Plaintiff on behalf of DirectTV.
16

17 20. Plaintiff disputed owing any debt to DirectTV, as any charges on the
18 account occurred after she had moved and DirectTV failed to cancel the service.
19

20 21. Beginning in October 2010, Defendant constantly and continuously
21 placed collection calls to Plaintiff's home and cellular telephone numbers seeking
22 and demanding payment for the alleged debts.
23

24 22. On average, Defendant contacted Plaintiff on her home and cellular
25 telephones at least two (2) times a day.
26

27 23. In addition, Defendant would leave Plaintiff voice mail messages
28 claiming that it was urgent that Plaintiff return its calls.
29

1 24. On or about November 26, 2010, Defendant placed a collection call to
2 Plaintiff and spoke with Plaintiff's son.

3 25. Defendant refused to allow Plaintiff's son take a message, instead
4 keeping him on the phone demanding responses to its questions.

5 26. In addition to calling Plaintiff, Defendant constantly and continuously
6 placed calls to Plaintiff's mother once a week for two months asking to speak with
7 Plaintiff.

8 27. On numerous occasions, Plaintiff's mother advised Defendant that
9 Plaintiff did not live with her and to stop calling.

10 28. However, Defendant ignored Plaintiff's mother's instructions and
11 continued to contact her in its attempts to collect a debt from Plaintiff.

12 29. On or about December 6, 2010, Plaintiff viewed her credit report and
13 learned that Defendant had reported the disputed debts on her credit report. See
14 Plaintiff's credit report attached hereto as "Exhibit A."

15 30. Upon information and belief, Defendant failed to send Plaintiff
16 written notification informing her of her rights to dispute the debts and/or request
17 verification of the debts.

18 31. Defendant conducted its debt collection activities in ways that were
19 factually misrepresented and in violation of the FDCPA.

CONSTRUCTION OF APPLICABLE LAW

32. The FDCPA is a strict liability statute. Taylor v. Perrin, Landry, deLaunay & Durand, 103 F.3d 1232 (5th Cir. 1997). "Because the Act imposes strict liability, a consumer need not show intentional conduct by the debt collector to be entitled to damages." Russell v. Equifax A.R.S., 74 F. 3d 30 (2d Cir. 1996); see also Gearing v. Check Brokerage Corp., 233 F.3d 469 (7th Cir. 2000) (holding unintentional misrepresentation of debt collector's legal status violated FDCPA); Clomon v. Jackson, 988 F. 2d 1314 (2d Cir. 1993).

33. The FDCPA is a remedial statute, and therefore must be construed liberally in favor of the debtor. Sprinkle v. SB&C Ltd., 472 F. Supp. 2d 1235 (W.D. Wash. 2006). The remedial nature of the FDCPA requires that courts interpret it liberally. Clark v. Capital Credit & Collection Services, Inc., 460 F. 3d 1162 (9th Cir. 2006). “Because the FDCPA, like the Truth in Lending Act (TILA) 15 U.S.C §1601 *et seq.*, is a remedial statute, it should be construed liberally in favor of the consumer.” Johnson v. Riddle, 305 F. 3d 1107 (10th Cir. 2002).

34. The FDCPA is to be interpreted in accordance with the "least sophisticated" consumer standard. See Jeter v. Credit Bureau, Inc., 760 F.2d 1168 (11th Cir. 1985); Graziano v. Harrison, 950 F. 2d 107 (3rd Cir. 1991); Swanson v. Southern Oregon Credit Service, Inc., 869 F.2d 1222 (9th Cir. 1988). The FDCPA was not "made for the protection of experts, but for the public - that vast multitude

which includes the ignorant, the unthinking, and the credulous, and the fact that a false statement may be obviously false to those who are trained and experienced does not change its character, nor take away its power to deceive others less experienced.” Id. The least sophisticated consumer standard serves a dual purpose in that it ensures protection of all consumers, even naive and trusting, against deceptive collection practices, and protects collectors against liability for bizarre or idiosyncratic interpretations of collection notices. Clomon, 988 F. 2d at 1318.

COUNT I
DEFENDANT VIOLATED THE
FAIR DEBT COLLECTION PRACTICES ACT

35. Defendant violated the FDCPA based on the following:
- a. Defendant violated §1692 generally;
 - b. Defendant violated §1692b(3) of the FDCPA by communicating with a third party more than once without permission to do so and without believing that the earlier response was erroneous or incomplete;
 - c. Defendant violated §1692d of the FDCPA by engaging in conduct the natural consequence of which is to harass, oppress, or abuse the Plaintiff in connection with the collection of a debt;
 - d. Defendant violated §1692d(5) of the FDCPA by causing a

telephone to ring and engaging Plaintiff in telephone conversations repeatedly and continuously with the intent to annoy, abuse or harass;

- e. Defendant violated §1692e of the FDCPA by using false, deceptive, or misleading representations or means in connection with the collection of a debt;
 - f. Defendant violated §1692f of the FDCPA by using unfair and unconscionable means with Plaintiff to collect or attempt to collect a debt; and
 - g. Defendant violated §1692g of the FDCPA by failing to send written notification, within five (5) days after its initial communication with Plaintiff, advising Plaintiff of her rights to dispute the debt or request verification of the debt.

36. As a direct and proximate result of one or more or all of the statutory violations above, Plaintiff has suffered emotional distress.

WHEREFORE, Plaintiff, CRYSTAL DUNSTON, respectfully requests judgment be entered against Defendant, NCO FINANCIAL SYSTEMS, INC., for the following:

- a. Declaratory judgment that Defendant's conduct violated the Fair Debt Collection Practices Act.

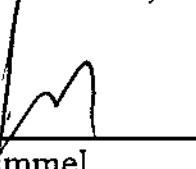
- 1 b. Statutory damages pursuant to the Fair Debt Collection Practices
2 Act, 15 U.S.C. § 1692k,
3
4 c. Actual damages,
5
6 d. Costs and reasonable attorneys' fees pursuant to the Fair Debt
7 Collection Practices Act, 15 U.S.C. § 1692k
8
9
10 e. Any other relief that this Honorable Court deems appropriate.

10 **DEMAND FOR JURY TRIAL**

11 PLEASE TAKE NOTICE that Plaintiff, CRYSTAL DUNSTON, demands a
12 jury trial in this case.
13

14 DATED: 4/15/11

15 RESPECTFULLY SUBMITTED,
16 KIMMEL & SILVERMAN, P.C.

17 By: _____
18 
19 Craig Thor Kimmel
20 Attorney ID # 57100
21 Kimmel & Silverman, P.C.
22 30 E. Butler Pike
23 Ambler, PA 19002
24 Phone: (215) 540-8888
25 Fax: (877) 788-2864
 Email: kimmel@creditlaw.com

Consumer Credit Report for CRYSTAL M. DUNSTON

File Number: 230251688
 Page: 5 of 9
 Date Issued: 11/30/2010

**NCO FINANCIAL SYSTEMS**

7420

Balance: \$336
 Date Updated: 10/2010
 Original Amount: \$336
 Original Creditor: 11 DIRECTV
 Past Due: \$336

Pay Status: >COLLECTION ACCOUNT
 Account Type: OPEN ACCOUNT
 Responsibility: INDIVIDUAL ACCOUNT

Loan Type: COLLECTION AGENCY/ATTORNEY

Remarks: PLACED FOR COLLECTION

Date placed for collection: 04/2010

Estimated date that this item will be removed: 11/2014

NOVASTAR MORTGAGE INC

6369

Balance: \$0
 Date Updated: 11/2007
 High Balance: \$318,300
 Terms: 480 MONTHLY \$2370

Pay Status: >60 DAYS PAST DUE
 Account Type: MORTGAGE ACCOUNT
 Responsibility: INDIVIDUAL ACCOUNT
 Date Open: 01/2007
 Date Closed: 11/2007

Loan Type: CONVENTIONAL REAL ESTATE MTG

Remarks: TRANSFERRED TO ANOTHER LENDER

>Maximum delinquency of 60 days occurred in 11/2007<

Estimated date that this item will be removed: 09/2014

Late Payments (6 months)	30	60	90	Last 6 months	30	OK	OK	OK	OK	OK
	0	0	0	oct	sep	aug	jul	jun	may	

OXFORD COLLECTION AGENCY

3775

Balance: \$336
 Date Updated: 06/2009
 Original Amount: \$336
 Original Creditor: 11 DIRECTV
 Past Due: \$336

Pay Status: >COLLECTION ACCOUNT
 Account Type: OPEN ACCOUNT
 Responsibility: INDIVIDUAL ACCOUNT

Loan Type: COLLECTION AGENCY/ATTORNEY

Remarks: PLACED FOR COLLECTION

Date placed for collection: 12/2008

Estimated date that this item will be removed: 03/2015

SALUTE

9150

Balance: \$0
 Date Updated: 09/2010
 High Balance: \$803
 Credit Limit: \$500

Pay Status: PAID OR PAYING AS AGREED
 Account Type: REVOLVING ACCOUNT
 Responsibility: INDIVIDUAL ACCOUNT
 Date Open: 06/2007
 Date Closed: 07/2008
 Date Paid: 11/2008

Loan Type: CREDIT CARD

Remarks: ACCT CLOSED BY CREDIT GRANTOR

Late Payments (39 months)	30	60	90	Last 39 months	X	OK																		
	0	0	0	aug	aug	Jul	Jun	May	Apr	Mar	Feb	Jan	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar	Feb	Jan
					OK																			
					aug	Jul	Jun	May	Apr	Mar	Feb	Jan	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar	Feb	

SAXON MORTGAGE SVS INC

6337

Balance: \$0
 Date Updated: 12/2008
 High Balance: \$318,300
 Collateral: BALLOON DUE 01012037 192268
 Terms: 480 MONTHLY \$2369

Pay Status: >120 DAYS PAST DUE
 Account Type: MORTGAGE ACCOUNT
 Responsibility: INDIVIDUAL ACCOUNT
 Date Open: 01/2007

Loan Type: CONVENTIONAL REAL ESTATE MTG

Remarks: FORECLOSURE, COLLATERAL SOLD

>Maximum delinquency of 90+ days occurred in 02/2008<

Estimated date that this item will be removed: 08/2014

Late Payments (10 months)	30	60	90	Last 30 months	120	150	180	210	240	270	300	330	360	390	420	450	480	510	540	570	600	630	660
	0	0	10	nov	oct	sep	aug	jul	jun	may	apr	mar	feb	jan									

PLAINTIFF'S EXHIBIT

B

ALL STATE LEGAL